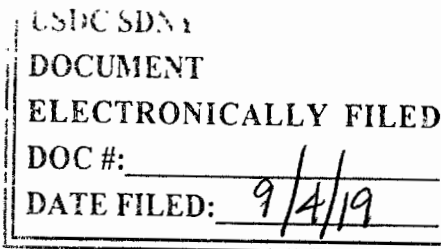


VedderPrice



Chicago
New York
Washington, DC
London
San Francisco
Los Angeles
Singapore
vedderprice.com

August 9, 2019

Michael J. Edelman
Shareholder
+1 212 407 6970
mjedelman@vedderprice.com

VIA HAND DELIVERY AND ECF FILING

The Honorable Naomi Reice Buchwald
United States District Judge
United States District Court
Southern District of New York
500 Pearl St.
New York, NY 10007-1312

Re: *Fan Engine Securitization Limited and Jet Engine Holding S.à r.l. vs. Deutsche Bank Trust Company Americas, Case No. 19-cv 4318 (NRB) (S.D.N.Y.)* –
Chamber Copies of Reply Papers in Support of Summary Judgment Motion under Rule 2(C) of Your Individual Rules of Practice

Dear Judge Buchwald:

We represent Fan Engine Securitization Limited and Jet Engine Holding S.à r.l. (collectively, the “*Plaintiffs*”) in the above-referenced case

A. Courtesy Copy of Filings. In accordance with Rule 2(C) of your Individual Rules of Practice, enclosed are two courtesy copies of each of the following documents that were filed by the Plaintiffs on August 7, 2019:

- Reply Memorandum of Law in Support of Motion of Plaintiffs Fan Engine Securitization Limited and Jet Engine Holding S.À R.L. for Summary Judgment That No Event of Default Has Occurred Under the Terms of the Indenture and Related Operative Documents [Docket No. 48]; and
- Plaintiffs Fan Engine Securitization Limited and Jet Engine Holding S.À R.L. Response to the Loomis Funds’ Rule 56.1 Supplemental Statement of Fact [Docket No. 49].

These reply papers were filed in conformance with the consensual scheduling letter that this Court approved on June 26, 2019 [Docket No. 27].

B. Request for Expedited Consideration. As all parties have acknowledged, the current financing that is the subject of this litigation was supposed to be refinanced by this October 2019 (*i.e.*, within two months from now). As detailed in the Plaintiffs’ summary judgment papers and their original emergency motion seeking injunctive relief, the ongoing dispute regarding whether a valid Event of Default has occurred is materially undermining the Issuer’s refinancing efforts and is threatening the Issuer’s continued viability. Also, the Plaintiffs’ summary judgment motion has now been fully briefed by all parties in accordance with this Court’s approved schedule for the briefing thereon. *See* Docket No. 27 [memo endorsement of briefing schedule]. Accordingly, the Plaintiffs respectfully request that this Court schedule the hearing and adjudicate the Plaintiffs pending summary judgment motion as expeditiously as practicable (subject to this Court’s availability).

September 16, 2019. So Ordered *Naomi Reice Buchwald, USDC* 9/4/19

1633 Broadway, 31st Floor | New York, New York 10019 | T +1 212 407 7700 | F +1 212 407 7799

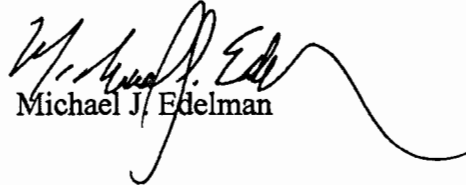
Vedder Price P.C. is affiliated with Vedder Price LLP, which operates in England and Wales, Vedder Price (CA), LLP, which operates in California, and Vedder Price Pte. Ltd., which operates in Singapore.

Application is not as oral argument has been scheduled for

The Honorable Naomi Reice Buchwald
August 9, 2019
Page 2

Thank you for your time and consideration regarding these matters.

Respectfully submitted,


Michael J. Edelman

Enclosures

cc: Mark D. Kotwick, Esq. (
Ross Hooper, Esq.
Kimberly A. Haviv, Esq.
Samuel P. Hershey, Esq.
Harrison Denman
Jason N. Zakia, Esq.
Daniel C. Green, Esq.

Via E-Mail (kotwick@sewkis.com)

Via E-Mail (hooper@sewkis.com)

Via E-Mail (kim.haviv@whitecase.com)

Via E-Mail (sam.hershey@whitecase.com)

Via E-Mail (harrison.denman@whitecase.com)

Via E-Mail (jzakia@whitecase.com)

(As courtesy copies of the reply papers have previously been sent to above listed parties, only this letter is being sent to such parties.)